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November 19, 2021

VIA ECF and email to CronanNYSDChambers@nysd.uscourts.gov

Honorable John P. Cronan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

**RE: Ford v. New York City Board of Education
19-CV-6327 (JPC) (KHP)**

Dear Judge Cronan:

I represent the Plaintiff in the above-referenced matter and am writing this letter *on consent* to request an extension of time to file opposition papers to Defendant's Motion to Dismiss. Plaintiff's opposition papers are due on November 29, 2021 and Defendant's reply is due on December 13, 2021. Plaintiff is requesting to December 14, 2021 to file his opposition papers and Defendant's reply due on December 28, 2021. This is the first request for an extension of time by Plaintiff.

The reason for the request is that Plaintiff counsel has had a confluence of deadlines along with the upcoming Thanksgiving holiday. Plaintiff is preparing an Order to Show Cause concerning the Gifted and Talented Program, has another Order to Show Cause pending in Nassau County and is expected to be filing an appeal from adverse 3020-a hearing decision that has a 10-day statutory deadline in which to prepare an Article75/78 regarding an extensive multi days hearing. Thus, Plaintiff is requesting the following revised schedule

- a. Plaintiff's opposition paper to be filed on December 14, 2021
- b. Defendant's reply (if any) to be filed by December 28, 2021.

Thank you for your consideration in this matter.

Very truly yours,


STEWART LEE KARLIN
SLK/cb
cc: Nicholas Green, ACC via ECF